

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

JUDICIAL WATCH, INC., et al.,

Plaintiffs,

v.

J. BRADLEY KING, et al.,

Defendants.

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CASE NO. 1:12-cv-00800-WTL-TAB

**DEFENDANTS' RENEWED UNOPPOSED MOTION FOR
EXTENSION OF TIME TO SUBMIT EXPERT REPORT**

The defendants J. Bradley King and Trent Deckard, Co-Directors of the Indiana Election Division, and Connie Lawson, Indiana Secretary of State, by counsel, pursuant to Southern District of Indiana Local Rule 6-1(a), hereby file this renewed unopposed motion to extend the time within which the defendants are to file their expert report twenty-eight days (28) days, to September 23, 2013, and in support state as follows:

1. The deadline for the defendants to file their expert report was August 26, 2013. When the defendants filed their initial motion for an extension of time to submit their expert report on August 26, 2013, that deadline had not passed.

2. This Court denied the defendants' motion because good cause had not been articulated in the initial motion for an extension of time. Undersigned counsel regrets any inconvenience caused due to the failure to state the good cause that exists for an extension of time to submit the report.

3. Good cause exists to extend the time the defendants have to submit their expert report. First, the State of Indiana requires the completion of several steps before obtaining approval for contracting with an expert, especially on a complex case of this nature. Although

the defendants had conscientiously promoted the completion of the process, this process was prolonged because of the relative novelty of the issues in this case vis-à-vis expert evidence. In addition, undersigned counsel has been absent from the office unexpectedly for periods of time during the past several weeks due to unexpected child care obligations.

4. As stated previously, undersigned counsel for the defendants contacted the plaintiffs' counsel, Chris Fedeli, on August 26, 2013, regarding an extension of time. Mr. Fedeli stated that he had no objection to the defendants extending the time to September 23, 2013, to submit their expert report.

For the above reasons, and pursuant to Southern District of Indiana Rule 6.1(d), the defendants request that the time to submit their expert report be extended to September 23, 2013.

Respectfully submitted,

GREGORY F. ZOELLER
Indiana Attorney General
Attorney No. 1958-98

Date: September 4, 2013

By: s/ Jefferson S. Garn
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CERTIFICATE OF SERVICE

I hereby certify that on September 4, 2013, a copy of the foregoing ***Defendants' Renewed Unopposed Motion for Extension of Time to Submit Expert Report*** was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system:

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